



**DECLARATION OF JOHN J. QUEIROLO, JR.**

I, John J. Queirolo, Jr., declare as follows:

1. I make this declaration in support of Al Rajhi Bank's Opposition to Plaintiffs' Motion to Compel Production of Documents filed in *In re Terrorist Attacks on September 11, 2001*, Case No. 1:03-md-01570-GBD-SN (S.D.N.Y.). I am over the age of 18 years, am familiar with the information contained in this declaration, and am competent to testify as to that information.

2. I am a Director of Business Development at Innovative Discovery, LLC. I have held this position since April 12, 2017. I have over 30 years of experience in the litigation support field. I have a JD from the Massachusetts School of Law and was a member of the Massachusetts Bar.

3. I have reviewed and am familiar with the Statement of Naif Al Dahmashi at Al Rajhi Bank that I understand also is being submitted in support of the Bank's Opposition to Plaintiffs' Motion to Compel.

4. Further, the estimates provided in this declaration are based solely on the information provided by Mr. Al Dahmashi without any direct access to the hard-copy documents or direct knowledge of the type, size, or condition of the hard-copy documents.

5. In that statement, Mr. Al Dahmashi estimates that approximately 114,420 boxes from the Bank's Archive Center would contain a total of approximately 286 million pages of hard-copy documents (assuming 2,500 pages per box). Mr. Al Dahmashi also estimates that approximately 13,049 boxes (approximately 32,622,500 pages, assuming 2,500 pages per box) out of the 114,420 boxes do not contain documents that can be selected by combination of transaction

date and branch (“Non-Transaction Documents”). Finally, Mr. Al Dahmashi estimates the costs to retrieve these boxes and scan their contents.

6. I estimate that the scans of 114,420 boxes (approximately 286 million pages) of hard-copy documents would result in approximately 14,300 gigabytes to 19,000 gigabytes (or “GB”) of electronic data. I also estimate that scans of 13,049 boxes (approximately 32,622,500 pages) of hard-copy documents would result in approximately 1,631 GB to 2,175 GB of electronic data. These estimates are based upon an industry average of 15,000 to 20,000 pages per GB of black & white Group IV Tiff images, with a DPI (“Dots Per Inch”) resolution of 300 x 300.

7. Data for the scans of 114,420 boxes (approximately 286 million pages) of hard-copy documents would then have to be hosted with a third-party vendor so it could be effectively processed and reviewed. Depending on the vendor selected, I estimate pricing for loading this data into a Relativity hosting platform located in either the United States (“US”) or the European Union (“EU”) to be approximately \$5.00 per GB. Therefore, approximately 14,300 GB of data to be loaded would result in estimated load fees of approximately \$71,500.00 and approximately 19,000 GB of data to be loaded would result in estimated load fees of approximately \$95,000.00. Additionally, estimated storage prices for hosting this volume of data within a Relativity hosting platform located in the US or EU range from \$3.00 to \$8.00 per GB. Therefore, hosting of 14,300 GB of data in either the US or EU would result in storage fees between \$42,900.00 and \$114,400.00 per month and hosting of 19,000 GB in either the US or EU would result in storage fees between \$57,000.00 and \$152,000.00. This would result in an annual cost for storage between \$514,800.00 and \$1,824,000.00 for the data generated by scanning the approximately 114,420 boxes of hard-copy documents. Please note these hosting estimates do not include user accounts that typically range from \$75.00 to \$95.00 per user account. At this time, we are not able to estimate the number of user accounts that would be needed.

8. Similarly, depending on the vendor selected, I estimate pricing for loading data for the scans of 13,049 boxes (approximately 32,622,500 pages) of hard-copy documents into a Relativity hosting platform located in either the United States (“US”) or the European Union (“EU”) to be approximately \$10.00 per GB. Therefore, approximately 1,631 GB of data to be loaded would result in estimated load fees of approximately \$16,310.00 and approximately 2,175 GB of data to be loaded would result in estimated load fees of approximately \$21,750.00. Additionally, estimated storage prices for hosting this volume of data within a Relativity hosting platform located in the US or EU range from \$5.00 to \$8.00 per GB. Therefore, hosting of 1,631 GB of data in either the US or EU would result in storage fees between \$8,155.00 and \$13,048.00 per month and hosting of 2,175 GB in either the US or EU would result in storage fees between \$10,875.00 and \$17,400.00. This would result in an annual cost for storage between \$97,860.00 and \$208,800.00 for the data generated by scanning the approximately 13,049 boxes of hard-copy documents. Please note these hosting estimates do not include user accounts that typically range from \$75.00 to \$95.00 per user account. At this time, we are not able to estimate the number of user accounts that would be needed.

9. I estimate that the approximately 286 million pages (114,420 boxes) of hard-copy documents contain approximately 71,500,000 documents. I also estimate that the approximately 32,622,500 pages (13,049 boxes) of hard-copy documents contain approximately 8,155,625 documents. These estimates assume an average document length of 4 pages per document according to industry averages, as well as the information described in Paragraph 15 of Mr. Al Dahmashi’s statement.

10. In sum, the total estimated cost for loading, hosting for one (1) year, and reviewing (per the Declaration of Ms. Fetgatter) the 114,420 boxes of hard-copy documents identified in Mr. Al Dahmashi’s statement would range from approximately \$92,106,300.00 to \$250,381,500.00. Similarly, the total estimated cost for loading, hosting for one (1) year, and

reviewing (per the Declaration of Ms. Fetgatter) the 13,049 boxes of non-transactional, hard-copy documents identified in Mr. Al Dahmashi's statement would range from approximately \$10,553,370.00 to \$28,571,347.00.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Easton, CT on September 1, 2021.

  
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John J. Queirolo, Jr.